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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$282,500.00 IN
U.S. CURRENCY,
15 Defendant.
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2:24-MC-00317-DJC-CKD

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimant Ronnie
19 Borrego (“claimant”), by and through their respective counsel, as follows:

20 1. On or about May 15, 2024, claimant filed a claim in the administrative forfeiture
21 proceeding with the Drug Enforcement Administration with respect to the above-referenced currency
22 (hereafter “defendant currency”), which was seized on or about February 9, 2024.

23 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
26 than claimant has filed a claim to the defendant currency as required by law in the administrative
27 forfeiture proceeding.

28 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
3 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
4 parties. That deadline was August 13, 2024.

5 4. By Stipulation and Order filed August 13, 2024, the parties stipulated to extend to October
6 11, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
8 forfeiture.

9 5. By Stipulation and Order filed October 8, 2024, the parties stipulated to extend to
10 December 10, 2024, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
12 subject to forfeiture.

13 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
14 to February 7, 2025, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
16 subject to forfeiture.

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7. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to February 7, 2025.

Dated: 12/6/2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: 12/6/2024

/s/ Isaac Safier
ISAAC SAFIER
Attorney for potential claimant
Ronnie Borrego
(Authorized by email)

IT IS SO ORDERED

Dated: December 9, 2024

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE